

US EPA ARCHIVE DOCUMENT

# Management Of Hazardous Waste



# Managing Hazardous Wastes

## The Solid/Hazardous Waste Determination



# Step 1

## **Determine if the material is a solid waste.**

- Rule 335-14-2-.01(2) defines “solid waste “ as any discarded material that is not excluded by definition or that is not excluded by a variance.
- A "Discarded Material" is any material which is: abandoned; accumulated, stored, or treated before recycling; or considered inherently waste like.

**If the waste is excluded from regulation, then it is not a solid waste or hazardous waste.**

**If the waste is not excluded from regulation, continue to Step 2.**



## Step 2

**Determine if the Solid Waste is excluded from regulation as a Hazardous Waste.**

Rule 335-14-2-.01(3) excludes many types of solid waste from regulation as hazardous waste. Most of the exclusions are based either on the way that the waste will be used or on the fact that the waste is regulated under some other program.

**If the waste is not excluded from regulation, then continue to Step 3.**



## Step 3

**Determine if the Solid Waste is a Listed Hazardous Waste.**

A solid waste is a hazardous waste if it is listed in Rule 335-14-2-.04.

**If the waste is identified in Rule 335-14-2-.04, then it must be managed as a hazardous waste.**

**If the waste is not identified in Rule 335 -14 -2 -.04 , then continue to Step 4.**



## Step 4

**Determine if the Solid Waste exhibits a characteristic of a hazardous waste.**

A solid waste is a hazardous waste if it exhibits one of the characteristics of a hazardous waste given in Rule 335-14-2-.03. The four hazardous waste characteristics are Ignitability, Corrosivity, Reactivity, and Toxicity.

**If the waste displays a Characteristic identified in Rule 335-14-2-.03, then it must be managed as a hazardous waste.**

**If the waste does not display a Characteristic identified in Rule 335 -14 -2 -.04 , then it may be disposed of as an industrial solid waste.**



# Counting Your Hazardous Waste

The specific regulations that apply to a generator depend on the amount of hazardous waste produced during a *calendar month*.





# Determining Which Hazardous Waste Regulations Apply To You

- **CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR**

No more than 100 kilograms (about 220 pounds or 25 gallons) of hazardous waste and no more than 1 kg (about 2 pounds) of acutely hazardous waste

- **SMALL QUANTITY GENERATOR**

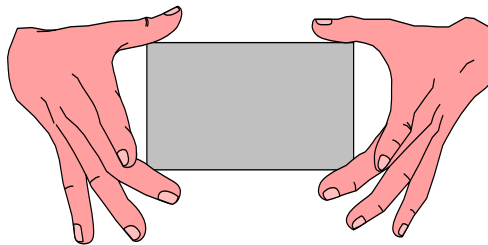
More than 100 and less than 1000 kg (between 220 and 2200 pounds or about 25 to under 300 gallons) of hazardous waste and no more than 1 kg of acutely hazardous waste

- **LARGE QUANTITY GENERATOR**

1000 kg (about 2,200 pounds or 300 gallons) or more of hazardous waste, or more than 1 kg of acutely hazardous waste



# The Conditionally Exempt Small Quantity Generator (CESQG) Regulations





# **HW Management For CESQG's**

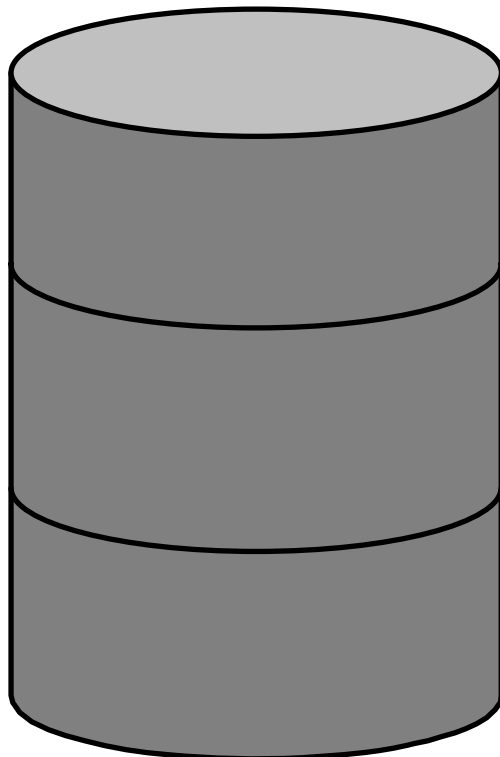
**Provide the Department with a plan for the disposal of all hazardous wastes generated should the Department request such a plan.**

**Either treat or dispose of hazardous waste at a facility, on-site or off-site, which is:**

- **Permitted to treat or dispose of hazardous waste by USEPA, ADEM, or the equivalent authority in another state; or**
- **In interim status; or**
- **Permitted, licensed , or registered by the Department to manage municipal or industrial solid waste; or**
- **A facility which beneficially uses, reuses, recycles, or reclaims hazardous waste or treats the hazardous waste prior to doing so.**



# The Small Quantity Generator (SQG) Regulations





# **General SQG Requirements**

- **Must obtain an EPA identification number.**
- **Must store hazardous waste in tanks or containers.**
- **Must never accumulate more than 6000 kgs of hazardous waste on-site.**
- **Must never accumulate hazardous waste for more than 180 days (or 270 days if the designated facility is more than 200miles away).**
- **Must ensure all employees are trained in proper waste handling and emergency procedures relevant to their job responsibilities.**



# Notification for Hazardous Waste Generators

- A SQG must notify the Department and receive an EPA Identification Number.
- To obtain an EPA Identification Number, call or write the ADEM and ask for a copy of ADEM Form 8700-12, "Notification of Regulated Waste Activity." The form can also be downloaded from the ADEM's website at [www.adem.state.al.us](http://www.adem.state.al.us).



# **SQG Preparedness and Prevention Requirements**

**Facilities must be maintained and operated to minimize the possibility of fire, explosion, or any unpermitted release of hazardous waste to the environment.**

**Required emergency equipment:**

- **On-site emergency communications or alarm;**
- **A telephone or other communications device capable of summoning off-site emergency help;**
- **Appropriate emergency equipment such as fire extinguishers and spill control equipment.**
- **Water at adequate volume and pressure for emergency uses.**

**Adequate aisle space to allow emergency access must be maintained.**

**Arrangements with off-site emergency personnel (i.e., police, fire, and hospitals) must be made.**



# **SQG Container Management Requirements**

**Containers holding hazardous waste must be in good condition.**

**Containers must be kept closed except when it is necessary to add or remove hazardous waste.**

**Container storage areas must be inspected weekly.**

**Incompatible wastes must not be stored in the same container.**

**The date upon which each period of accumulation begins must be clearly marked and visible for inspection on each container.**

**While being accumulated on site each container and tank must be labeled or marked clearly with the words, "Hazardous Waste" and the EPA hazardous waste number.**





# **SQG Shipping Requirements**

**Must use a transporter that has an EPA ID number and AHWMMMA transporter permit.**

**Must ship to a treatment, storage, or disposal facility that has an EPA ID number and is permitted to receive hazardous waste.**

**Must comply with DOT pretransport requirements before shipping the waste.**

**Must prepare and use a Uniform Hazardous Waste Manifest.**

**Must accompany the shipment with all**



# **SQG Recordkeeping and Reporting Requirements**

**Manifests must be maintained for a period of three years from the date that the hazardous waste was shipped.**

**LDR paperwork must be maintained for at least five years from the date that the waste was last shipped off-site.**

**Container storage inspections must be documented in an inspection log.**

**Where state or local authorities decline to enter into emergency agreements, it must be documented.**

**Spills or incidents involving hazardous waste that cause injury or have the potential to reach outside the facility or to surface waters must be reported to the National Response Center at 1-800-424-8802**